BEFORE THE DATA CENTRE DECISION

A Public-Interest Briefing Package for Municipal Representatives, Legislators and Communities

Developers arrive prepared.

They bring legal teams, consultants, economic modelling, draft policies, private meetings and a clear understanding of what they want approved.

Public representatives and communities deserve an equally prepared public-interest record.

The purpose of this package is not to replace public decision-making.

It is to make informed public decision-making possible.

Version: 1
Current edition: https://doi.org/10.5281/zenodo.21477903 – DOI: **10.5281/zenodo.21477903**
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HOW TO USE THIS PACKAGE

Data-centre developers typically approach governments with professional presentations, economic-impact studies, draft policy language, private briefings and clearly defined objectives.

Public representatives and communities should arrive equally prepared.

This package is designed to help municipal representatives, provincial and territorial legislators, federal representatives, public administrators and community organizations:

- understand the full scope of a proposed data-centre development;
- identify incomplete, evasive or narrowly framed answers;
- request the documents needed for meaningful review;
- determine which protections fall within municipal, provincial, territorial or federal authority;
- identify where responsibilities are shared or fragmented among governments and regulators;
- recognize when a local decision depends on action, approval or oversight from a higher level of government;
- identify protections that should exist before development proceeds;
- adapt model policies and legislative proposals;
- prepare project-specific submissions; and
- communicate concerns constructively and effectively.

Not every question, protection or policy proposal in this package applies equally to every public body.

A municipality may control land use, roads, servicing, setbacks, emergency response and local taxation while lacking authority over electricity markets, water allocation, environmental-assessment thresholds, foreign ownership or national security. Provincial, territorial and federal representatives may hold those powers while remaining distant from the communities carrying the project's immediate effects.

The purpose of this package is therefore not only to help readers examine the developer and the project before them. It is also to help them look upward through the approval system, identify which governments and regulators are responsible, and place unanswered questions and legislative gaps before the bodies with the authority to address them.

Lack of local jurisdiction should not end the inquiry. It should identify where the inquiry must go next.

The package does not require readers to oppose data-centre development.

It asks that no major development be approved using only the information, definitions and policy framework supplied by the developer—or before every responsible level of government has been identified and called upon to fulfil its role.

For municipal representatives

Review the sections on project integration, zoning, disclosure, sound, servicing, emergency response, financial security and local taxation.

For legislators

Review the sections on environmental assessment, electricity, water, emissions, foreign ownership, data jurisdiction, cumulative development and provincial or federal standards.

For communities

Attach this package to a local submission that identifies the project, summarizes the community's concerns, highlights unanswered questions and states the action you want public officials to take.

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QUICK BRIEFING

BEFORE YOU MEET THE DEVELOPER — A TWO-MINUTE READ

This is a condensed summary of the complete briefing package. It does not replace the material that follows — it exists so that a representative walking into a first meeting with a developer has the essentials in hand before that meeting happens.

More detail is available throughout this document: the complete question bank is in Part Three, the full twelve-point readiness checklist is in Part Four, model policies and independent evidence are in Part Five, and a printable document-tracking checklist is in Appendix 1.

The Core Problem

Large data-centre developments are often presented as straightforward: investment, construction jobs, tax revenue and technological prestige. They rarely are. A hyperscale facility can require new power generation, transmission infrastructure, water withdrawals, wastewater systems, road upgrades, tax concessions and long-term public commitments — and it can introduce continuous noise, major electricity demand, foreign legal exposure and land-use conflicts that outlast the initial announcement.

The most common failure is fragmentation: the computing facility is assessed separately from its power plant, its water systems, its land holdings and its corporate structure, so no single review ever sees the complete project. A data centre and everything built to support it should be treated as one integrated project for planning, disclosure and public-interest review.

The Decision Standard

An investment announcement is not a completed assessment.

A developer's answer is not independent verification.

A voluntary promise is not an enforceable condition.

A project is ready for approval only when its full scope, effects, costs, responsibilities and long-term protections are known and secured.

TWELVE IMMEDIATE PRECAUTIONS

Before attending a developer presentation, private briefing, public hearing or approval meeting:

1. Do not sign an NDA concerning public policy, approvals, incentives, infrastructure or regulatory commitments.

2. Require disclosure of all affiliated companies, beneficial owners, parent corporations and financing partners.

3. Ask whether draft bylaws, policies, resolutions or agreements were supplied by the developer or its consultants.

4. Request the maximum contemplated build-out, not merely the first phase.

5. Separate temporary construction employment from permanent operating employment.

6. Require written definitions for every employment, investment, tax-benefit and renewable-energy claim.

7. Treat the computing facility, power generation, water systems, transmission, roads, pipelines and land holdings as one integrated project.

8. Ask what public infrastructure must be expanded and who will pay for it.

9. Request independent studies, not only developer-funded summaries.

10. Place unanswered questions and incomplete responses on the public record.

11. Do not accept data residency as proof of data sovereignty.

12. Do not make irreversible commitments before the relevant protections, monitoring and financial security exist.

This package does not require readers to oppose data-centre development. It asks that no major development be approved using only the information, definitions and policy framework supplied by the developer.

WHERE TO FIND MORE

- Questions, non-answers, and required follow-ups — Part Three
- Full twelve-point public-interest decision checklist — Part Four
- Model policies, legislative proposals and independent evidence — Part Five
- Printable document-tracking checklist (one row per question) — Appendix 1

PART ONE - BEFORE THE DATA CENTRE DECISION

A Briefing Note for Municipal Representatives and Legislators

Purpose

Large data-centre developments are increasingly presented to governments as straightforward opportunities: investment, construction jobs, tax revenue, technological prestige and economic diversification.

They are rarely straightforward.

A hyperscale data centre may require new power generation, transmission infrastructure, substations, pipelines, water withdrawals, wastewater systems, road upgrades, emergency planning, tax concessions and long-term public-service commitments. It may also introduce continuous low-frequency noise, substantial electricity demand, foreign legal exposure, land-use conflicts and liabilities that remain long after the initial announcement.

Municipal representatives and legislators are often asked to assess these projects after developers have already spent months shaping the conversation. Developers may arrive with polished presentations, draft policies, economic-impact studies, private briefings, proposed incentives and carefully limited answers.

Public officials need access to an equally prepared public-interest package before decisions are made.

This brief identifies the questions, protections and legislative gaps that should be addressed before development proceeds.

The central problem

Data centres are frequently assessed as isolated buildings rather than complete industrial systems.

The computing facility may be considered separately from its power plant. The power plant may be assessed separately from transmission infrastructure. Water use may be treated as a utility matter. Land acquisitions may be divided among subsidiaries. Noise may be evaluated only at the property line. Tax incentives may be approved without accounting for public infrastructure costs. Foreign ownership may be obscured through layered corporate structures.

This fragmentation prevents decision-makers and the public from seeing the project's full scale.

A data centre, its dedicated generation, grid connection, water systems, supporting infrastructure, affiliated land holdings and related corporate entities should be treated as one integrated project for planning, disclosure, environmental review and public-interest assessment.

WHAT REPRESENTATIVES SHOULD KNOW BEFORE MEETING THE DEVELOPER

The developer controls the early information environment

By the time a proposal reaches a public meeting, developers may already have held private discussions with administrators, utilities, landowners, economic-development agencies and elected officials.

Representatives should disclose:

- meetings and communications with developers or their consultants;
- draft bylaws, policies or agreements supplied by proponents;
- incentives, grants, tax arrangements or infrastructure commitments discussed;
- non-disclosure agreements requested or signed;
- lobbyists, intermediaries and affiliated companies involved; and
- public resources already committed to advancing the proposal.

Public policy should not be negotiated behind contractual secrecy.

Employment claims require definitions

"Thousands of jobs" often combines temporary construction work, indirect employment, vendor contracts and optimistic economic modelling.

Ask separately for:

- peak construction employment;
- construction duration;
- permanent full-time positions;
- part-time and contract positions;
- expected wages;
- local hiring commitments;
- automation assumptions; and
- public subsidy or infrastructure cost per permanent job.

No employment figure should be accepted without a written definition, methodology and clear separation of short-term construction work, long-term direct positions, full-time-equivalent employment, and indirect or induced estimates.

Where a government or approving body has no clear standard for reporting employment claims, it should develop one before relying on those claims. Adaptable resources such as The Jobs Reporting Act provide a framework for doing so.

Power demand is a public-policy issue

A large data centre can consume electricity on the scale of a town, city or major industrial facility.

Representatives should ask:

- What is the maximum operating load?
- What is the expected annual electricity consumption?
- Will the project draw from the public grid before dedicated generation exists?
- Who pays for transmission, substations and grid reinforcement?
- What happens during supply shortages?
- Will residents or existing businesses bear higher costs?
- Is claimed renewable power physically supplied, contractually matched or merely offset through certificates?

Dedicated gas generation does not remove the project from public concern. It adds emissions, fuel infrastructure, noise, water use and stranded-asset risk.

Water claims must include the full system

Developers may describe facilities as low-water or closed-loop without disclosing seasonal demand, evaporative losses, system flushing, water-quality requirements, backup cooling or indirect water use from electricity generation.

"Closed loop" does not mean no water use and does not eliminate the need to explain how water will be replaced, treated and discharged over the life of the facility.

Officials should require disclosure of:

- maximum daily and annual withdrawals;
- peak summer demand;
- source-water details;
- water-quality requirements and pre-treatment;
- evaporative and other consumptive losses;
- the volume and frequency of closed-loop flushing, blowdown and system replacement;
- wastewater volumes and chemical composition;
- chemicals, corrosion inhibitors, biocides and other treatment products used;
- whether wastewater will enter a municipal system;
- whether municipal wastewater infrastructure has sufficient capacity;
- who will pay for any required upgrades;

- whether an on-site treatment facility is proposed;
- treatment standards and monitoring requirements;
- the location and method of any discharge;
- whether any water may be released without treatment and under what authorization;
- handling and disposal of contaminated water, sludge and treatment residues;
- drought restrictions and priority of use;
- emergency and backup cooling requirements; and
- cumulative withdrawals and discharges associated with other proposed facilities.

Water assessment should follow the complete cycle—from withdrawal and treatment through use, loss, flushing, wastewater treatment and final discharge or disposal.

Noise cannot be reduced to one average number

Data centres may produce continuous tonal and low-frequency noise from fans, transformers, cooling systems, backup generators and power infrastructure.

Compliance with an average A-weighted decibel limit may fail to capture:

- low-frequency sound;
- tonal components;
- nighttime disturbance;
- vibration;
- intermittent generator testing;
- cumulative noise from multiple facilities; and
- impacts on nearby homes, livestock and wildlife.

Noise studies should be independent, publicly available and conducted before approval, after construction and during full operation.

Canadian location does not guarantee Canadian data sovereignty

Governments increasingly use data sovereignty to promote data-centre development. Yet data physically stored in Canada may still be controlled by foreign corporations and subject to foreign laws.

Decision-makers should distinguish among:

- data residency;
- corporate ownership;
- administrative access;
- encryption-key control;
- legal jurisdiction;
- subcontractor access; and

- the ability of a foreign government to compel disclosure.

A Canadian address is not the same as Canadian control.

Minimum protections before approval

No major data-centre development should proceed without enforceable requirements covering:

1. Whole-project assessment
2. Full ownership and beneficial-ownership disclosure
3. Independent environmental review
4. Public disclosure of incentives and infrastructure commitments
5. Defined and verified employment reporting
6. Grid and ratepayer protection
7. Water-use limits and drought planning
8. Continuous and frequency-appropriate noise monitoring
9. Financial security and decommissioning requirements
10. Prohibition of policy-related secrecy and NDAs

Municipal and legislative responsibilities

Municipalities control important decisions involving land use, zoning, roads, servicing, setbacks, emergency response and local taxation. They should use those powers fully rather than assuming provincial or federal jurisdiction makes local protections impossible.

Legislators must address the issues municipalities cannot resolve alone, including:

- environmental-assessment thresholds;
- electricity-market and transmission rules;
- foreign ownership and beneficial ownership;
- water allocation;
- emissions;
- tax treatment;
- data jurisdiction;
- intermunicipal cumulative effects; and
- minimum provincial, territorial or national standards.

Municipal representatives should identify legislative gaps publicly and formally request action from senior governments.

Legislators should not use municipal approval as evidence that a project has been comprehensively assessed when municipalities lack the authority to evaluate the entire system.

The decision standard

The question is not simply whether a data centre promises investment.

The proper question is whether the complete project—including its energy, water, land, infrastructure, ownership, legal jurisdiction, public costs and long-term liabilities—serves the public interest under enforceable rules.

Public officials should never enter a data-centre decision armed only with the developer's script.

NOTES

PART TWO - BEFORE MEETING THE DEVELOPER

IMMEDIATE PRECAUTIONS FOR PUBLIC REPRESENTATIVES

Before attending a developer presentation, private briefing, public hearing or approval meeting:

1. Do not sign an NDA concerning public policy, approvals, incentives, infrastructure or regulatory commitments.
2. Require disclosure of all affiliated companies, beneficial owners, parent corporations and financing partners.
3. Ask whether draft bylaws, policies, resolutions or agreements were supplied by the developer or its consultants.
4. Request the maximum contemplated build-out, not merely the first phase.
5. Separate temporary construction employment from permanent operating employment.
6. Require written definitions for every employment, investment, tax-benefit and renewable-energy claim.
7. Treat the computing facility, power generation, water systems, transmission, roads, pipelines and land holdings as one integrated project.
8. Ask what public infrastructure must be expanded and who will pay for it.
9. Request independent studies, not only developer-funded summaries.
10. Place unanswered questions and incomplete responses on the public record.
11. Do not accept data residency as proof of data sovereignty.
12. Do not make irreversible commitments before the relevant protections, monitoring and financial security exist.

PART THREE - QUESTIONS, NON-ANSWERS AND REQUIRED FOLLOW-UPS

NOTES

HOW TO USE THIS SECTION

Data-centre proposals are often presented through carefully limited definitions.

A developer may answer a question about the first building when the representative asked about the full development. It may describe average electricity consumption instead of maximum demand, direct water use instead of total water dependence, permanent employees instead of all publicly claimed jobs, or Canadian data storage instead of Canadian legal control.

An answer can therefore be technically accurate while still concealing the scale or consequence of the project.

This section is designed to help representatives recognize those distinctions.

Each entry includes:

Question: The question that should be asked clearly and placed on the public record.

Common non-answer: A representative example of how the issue may be narrowed, deferred or avoided.

Required follow-up: The question needed to bring the discussion back to the complete project.

Documents to request: The records required to verify the answer independently.

Questions should be submitted in writing wherever possible. Written responses, supporting records and outstanding information should be published before a hearing, approval or binding infrastructure commitment.

A promise made during a presentation is not a condition of approval unless it is written, enforceable, monitored and backed by consequences for non-compliance.

1. COMPLETE PROJECT SCOPE

NOTES

1.1 What is the complete project?

Question

What facilities, infrastructure, land interests and future phases are included in the complete development?

The answer should identify:

- computing buildings;
- maximum number of buildings;
- power generation;
- substations;
- transmission lines;
- natural-gas infrastructure;
- water withdrawals and pipelines;
- wastewater infrastructure;
- cooling systems;
- roads;
- fuel storage;
- backup generation;
- construction compounds;
- affiliated land holdings;
- worker accommodation;
- future expansion areas.

Common non-answer

The current application concerns only the first phase or the buildings located on the identified parcel.

Required follow-up

What is the maximum development contemplated, designed, optioned, marketed, requested from utilities or described to investors, customers and other government bodies?

Please provide the complete master plan regardless of which components are included in the current application.

Documents to request

- master development plan;
- phased site plans;
- investor or customer presentations;

- utility service requests;
- land-option agreements;
- internal build-out schedules;
- infrastructure concept plans;
- applications submitted to other regulators;
- maps showing all affiliated parcels.

NOTES

1.2 Which components are being reviewed separately?

Question

Which associated components of the development will be reviewed through separate applications, authorities, subsidiaries or timelines?

Common non-answer

Each component will be considered by the agency with jurisdiction over it.

Required follow-up

Who is responsible for assessing the combined environmental, infrastructure, financial and cumulative effects of all components together?

If no authority is conducting that assessment, why should approval proceed before the complete project has been reviewed?

Documents to request

- regulatory approvals matrix;
- list of required permits;
- names of all approving authorities;
- application schedules;
- consultant responsibility charts;
- correspondence concerning project segmentation;
- legal opinions concerning jurisdiction.

1.3 What is the maximum authorized build-out?

Question

What is the maximum capacity that could be developed under the requested zoning, permits, utility arrangements and land assembly?

Common non-answer

Actual construction will depend on market demand.

Required follow-up

Market timing is not the question. What is the maximum development that the requested approvals would permit without returning for a new comprehensive public review?

Documents to request

- requested zoning entitlements;
- development-envelope calculations;
- maximum floor-area projections;
- maximum electrical-service applications;
- water-reservation requests;
- expansion-right agreements;
- conceptual final-build plans.

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2. OWNERSHIP, CONTROL AND AFFILIATED COMPANIES

2.1 Who ultimately owns and controls the project?

Question

Who are the project's ultimate beneficial owners, controlling corporations, financing partners and expected operators?

Common non-answer

The applicant is the locally registered company named in the application.

Required follow-up

Who owns that company, who controls its board and decisions, and which parent, affiliate, lender, customer or contractual partner has effective control over the project?

Documents to request

- complete corporate-ownership chart;
- beneficial-ownership declaration;
- incorporation records;
- shareholder agreements;
- financing agreements;
- operating agreements;
- management contracts;
- parent-company guarantees;

- joint-venture agreements.

NOTES

2.2 Which entities are involved?

Question

List every affiliated company involved in land acquisition, construction, power generation, water supply, data-centre operation, financing, leasing and future expansion.

Common non-answer

The final corporate structure has not yet been determined.

Required follow-up

Which entities currently hold land, options, applications, contracts or rights connected to the proposal, and which entities are expected to assume them later?

No application should be assessed without knowing who controls each part of the project.

Documents to request

- list of related entities;
- land-title records;
- option agreements;
- assignment rights;
- contracts between affiliates;
- applications filed under related company names;
- shared directors and officers;
- registered lobbying disclosures.

2.3 Can the project or approvals be sold?

Question

Can the project, permits, land, utility rights, water allocations or tax agreements be sold or assigned to another company?

Common non-answer

Any transfer would comply with applicable law.

Required follow-up

Would a transfer require a new public-interest review, or could another company inherit the approvals without council, legislative or public reconsideration?

Documents to request

- permit-transfer provisions;
- assignment clauses;
- change-of-control clauses;
- tax-agreement transfer rights;
- servicing-agreement transfer rights;
- regulator approval requirements;
- lender step-in rights.

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3. LAND ASSEMBLY AND LAND-USE IMPACTS

3.1 How much land is controlled?

Question

How much land does the developer or its affiliates own, lease, option or otherwise control in the region?

Common non-answer

The proposed facility occupies only the area identified in the current application.

Required follow-up

Provide the total area controlled directly or indirectly for the development, supporting infrastructure, buffers, power generation, transmission, roads, water systems and future phases.

Documents to request

- land-title searches;
- lease agreements;
- purchase options;
- rights of first refusal;
- easements;
- pipeline and transmission corridors;
- maps of affiliated ownership;
- agreements with neighbouring landowners.

3.2 What land uses will be displaced or constrained?

NOTES

Question

What agricultural, residential, ecological, cultural or industrial uses will be displaced, fragmented or restricted by the complete development?

Common non-answer

The facility is compatible with the current land-use designation.

Required follow-up

Compatibility with zoning does not answer the question. What existing uses, future development rights, wildlife movement, drainage patterns or agricultural operations will be affected?

Documents to request

- agricultural-impact assessment;
- land-use compatibility study;
- ecological inventory;
- drainage study;
- traffic study;
- cultural and heritage assessment;
- neighbouring-land-use analysis;
- cumulative land-conversion maps.

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4. ELECTRICITY DEMAND

4.1 What is the maximum electrical load?

Question

What is the maximum electrical demand of the complete project at full build-out?

State the answer in megawatts and identify whether it includes:

- computing load;
- cooling;
- lighting;
- offices;
- substations;
- pumps;
- water treatment;
- battery losses;

- supporting infrastructure;
- future phases.

Common non-answer

The facility will scale gradually according to customer demand.

Required follow-up

What is the maximum load authorized, designed, requested or contemplated under all phases, regardless of when that load is expected to materialize?

Documents to request

- utility interconnection applications;
- load forecasts;
- maximum-demand studies;
- electrical design specifications;
- phased energization plans;
- customer-capacity commitments;
- transmission studies.

4.2 What will annual electricity consumption be?

Question

What is the expected annual electricity consumption at initial operation and full build-out?

Common non-answer

The project's maximum capacity does not reflect average operating demand.

Required follow-up

Provide the expected annual consumption under low, typical and high-utilization scenarios, including all cooling and supporting loads.

Documents to request

- annual consumption models;
- utilization assumptions;
- power-usage-effectiveness projections;
- hourly and seasonal load profiles;
- customer-demand forecasts;
- sensitivity analyses.

NOTES

NOTES

4.3 When will the load connect to the grid?

Question

Will any phase of the project draw from the public grid before dedicated generation or new transmission infrastructure is operational?

Common non-answer

The project intends to become largely self-sufficient.

Required follow-up

"Intends" and "eventually" do not establish sequencing. Identify the electricity source for every phase from first energization to full operation.

Documents to request

- energization schedule;
- construction sequencing;
- temporary-service agreements;
- grid-supply contracts;
- generation in-service dates;
- contingency plans for delayed generation;
- utility correspondence.

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5. DEDICATED POWER GENERATION

5.1 What generation will serve the facility?

Question

What electricity-generation facilities will serve the project, and who will own and operate them?

Common non-answer

The facility will use a diversified and reliable energy strategy.

Required follow-up

Identify each generation source, its capacity, fuel, expected annual output, ownership, location, approval status and construction schedule.

Documents to request

- generation applications;
- equipment specifications;
- ownership agreements;
- fuel-supply contracts;

- generation forecasts;
- emissions modelling;
- construction schedules;
- interconnection studies.

NOTES

5.2 Is the generation part of the project?

Question

Is dedicated generation being assessed as part of the complete data-centre development?

Common non-answer

The generation facility is a separate project being developed by another entity.

Required follow-up

Does the generation exist primarily to serve the data centre? Is it contractually, financially, operationally or corporately linked to the data-centre project?

If so, why is it not being assessed as one integrated development?

Documents to request

- power-purchase agreements;
- common-ownership records;
- shared financing documents;
- fuel and transmission agreements;
- generation-customer contracts;
- shared construction plans;
- internal project descriptions.

5.3 What happens if dedicated generation is delayed?

Question

What happens if the proposed generation, transmission or fuel infrastructure is delayed, reduced or never completed?

Common non-answer

The project schedule will be coordinated with energy availability.

Required follow-up

Would the project still be permitted to operate from the public grid, and under what maximum load, duration and cost-allocation rules?

Documents to request

- fallback-energy plan;
- grid-service agreements;
- curtailment arrangements;
- contingency forecasts;
- milestone conditions;
- enforcement provisions;
- termination rights.

NOTES

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6. GRID, TRANSMISSION AND RATEPAYER IMPACTS

6.1 Who pays for grid expansion?

Question

Who will pay for new transmission lines, substations, grid reinforcement, reserve capacity and system upgrades required by the project?

Common non-answer

The developer will pay all directly assigned connection costs.

Required follow-up

Which costs are considered direct, and which costs may be socialized across ratepayers, utilities, municipalities or taxpayers?

Include upstream reinforcement, reserve requirements, operating costs and future replacement.

Documents to request

- cost-allocation studies;
- interconnection agreements;
- transmission-upgrade estimates;
- utility rate applications;
- contribution agreements;
- public-infrastructure commitments;
- cost-recovery schedules.

6.2 Could existing customers face higher costs or reduced reliability?

NOTES

Question

What effect could the project have on electricity prices, reserve margins, congestion, curtailment and reliability for existing customers?

Common non-answer

The utility has confirmed that the project can be served.

Required follow-up

Can the project be served without increasing costs, delaying other connections, requiring new public investment or changing reliability risks for existing users?

Documents to request

- reliability assessment;
- congestion study;
- reserve-margin analysis;
- rate-impact analysis;
- system-expansion plan;
- queue-position records;
- curtailment protocols.

6.3 Will the project be required to curtail?

Question

Under what conditions will the data centre reduce demand during grid stress, supply shortages or emergency conditions?

Common non-answer

The project will participate in available demand-response programs.

Required follow-up

Is curtailment mandatory or voluntary? What load can be reduced, within what time, and who has authority to order it?

Documents to request

- demand-response agreements;
- operating protocols;
- emergency-curtailment terms;
- minimum-load requirements;
- backup-generation plans;

- enforcement provisions.

NOTES

7. RENEWABLE-ENERGY AND EMISSIONS CLAIMS

7.1 What does “powered by renewable energy” mean?

Question

When the project claims renewable, clean, matched or carbon-free electricity, what precisely does that claim mean?

Common non-answer

The company will match its electricity use with 100 per cent renewable energy.

Required follow-up

Will renewable electricity physically serve the facility when it is operating, or will the claim rely on annual accounting, certificates, offsets or contracts elsewhere?

Documents to request

- power-purchase agreements;
- renewable-energy certificates;
- hourly matching methodology;
- emissions-accounting rules;
- generation-location data;
- additionality analysis;
- offset contracts.

7.2 What are the complete emissions?

Question

What are the expected annual greenhouse-gas and air-pollutant emissions from the complete project?

Include:

- dedicated generation;
- backup generators;
- construction;
- fuel supply;
- purchased electricity;

- refrigerants;
- equipment replacement;
- supporting infrastructure.

Common non-answer

The facility itself does not produce significant direct emissions.

Required follow-up

Provide direct, indirect and associated emissions for the complete operating system, not only the computing buildings.

Documents to request

- emissions inventory;
- lifecycle assessment;
- air-dispersion modelling;
- fuel-consumption forecasts;
- refrigerant inventory;
- generator-testing schedule;
- purchased-electricity emissions factors.

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8. WATER SUPPLY, COOLING AND WASTEWATER

8.1 How much water will the project use?

Question

What are the project's maximum daily, annual and seasonal water requirements at initial operation and full build-out?

Common non-answer

The facility will use a closed-loop or water-efficient cooling system.

Required follow-up

How much makeup water, cleaning water, humidification water, emergency water and evaporative replacement will still be required?

Provide maximum demand, not only average consumption.

Documents to request

- water-balance model;
- cooling-system design;
- maximum withdrawal calculations;
- seasonal demand forecast;

- water-usage-effectiveness projections;
- emergency-water plan;
- expansion assumptions.

NOTES

8.2 Where will the water come from?

Question

Identify every proposed water source and the legal authority, allocation or agreement supporting its use.

Common non-answer

Water will be supplied through existing municipal or regional systems.

Required follow-up

Does the existing system have adequate source capacity, treatment capacity, storage, pressure and drought resilience without shifting costs or restrictions onto existing users?

Documents to request

- water-supply agreement;
- allocation licence;
- municipal capacity study;
- source-water assessment;
- drought plan;
- infrastructure-upgrade plan;
- cost-allocation agreement.

8.3 What happens during drought or extreme heat?

Question

What operating restrictions will apply during drought, low-flow conditions, extreme heat or competing community demand?

Common non-answer

The facility will comply with all applicable water restrictions.

Required follow-up

Are industrial restrictions mandatory, enforceable and equal to or stronger than restrictions imposed on households, farms and existing businesses?

What operations will be reduced first?

NOTES

Documents to request

- drought-response plan;
- priority-of-use rules;
- curtailment conditions;
- emergency operating plan;
- historical supply modelling;
- climate-stress testing.

8.4 What wastewater will be produced?

Question

What wastewater, blowdown, treatment residuals and chemical discharges will the facility produce?

Common non-answer

The project will meet all wastewater standards.

Required follow-up

Identify the expected volume, temperature, chemical composition, discharge location, treatment requirement and receiving-system capacity.

Documents to request

- wastewater-characterization study;
- discharge application;
- treatment plan;
- chemical inventory;
- temperature modelling;
- sewer-capacity analysis;
- monitoring plan.

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9. SOUND, LOW-FREQUENCY NOISE AND VIBRATION

9.1 What will the complete project sound like?

Question

What sound will be produced by the complete project during normal operation, peak cooling, generator testing, emergency operation and future expansion?

Common non-answer

The development will comply with the applicable decibel limit.

Required follow-up

Does the assessment include:

- low-frequency sound;
- tonal sound;
- nighttime conditions;
- vibration;
- transformer hum;
- cooling fans;
- rooftop equipment;
- backup generators;
- power-generation equipment;
- substations;
- cumulative sound from all phases?

Documents to request

- full acoustic-impact assessment;
- frequency-band data;
- tonal analysis;
- low-frequency analysis;
- vibration study;
- equipment sound specifications;
- modelling files;
- nighttime scenarios;
- cumulative-noise model.

NOTES

9.2 Who prepared the sound study?

Question

Who selected, instructed and paid the acoustic consultant?

Common non-answer

The consultant is a qualified independent professional.

Required follow-up

Was the consultant retained by the developer? What assumptions, equipment selections, operating scenarios and mitigation measures were supplied by the developer?

Will the municipality or regulator obtain an independent peer review?

NOTES

Documents to request

- consultant engagement letter;
- scope of work;
- modelling instructions;
- conflict-of-interest declaration;
- equipment assumptions;
- peer-review report;
- correspondence concerning revisions.

9.3 How will sound be monitored after construction?

Question

What ongoing sound monitoring will occur after the facility begins operating and after each expansion?

Common non-answer

The developer will investigate verified complaints.

Required follow-up

How can a complaint be verified without continuous or representative monitoring?

Who controls the equipment and data, and what corrective action is mandatory when limits or tonal penalties are exceeded?

Documents to request

- monitoring plan;
- equipment specifications;
- public-data protocol;
- complaint procedure;
- investigation timelines;
- corrective-action requirements;
- penalty provisions;
- independent-audit schedule.

---

10. EMERGENCY RESPONSE, FIRE AND HAZARDOUS MATERIALS

NOTES

10.1 What emergency risks exist?

Question

What emergency scenarios have been assessed for the complete development?

Include:

- electrical fire;
- battery fire;
- fuel fire;
- gas leak;
- transformer failure;
- cooling-system failure;
- chemical spill;
- cyberattack;
- extended power loss;
- water-supply interruption;
- severe weather;
- evacuation.

Common non-answer

The project will comply with building and fire codes.

Required follow-up

Code compliance does not establish local response capacity. What resources, training, water supply, equipment and evacuation planning will be required from local services?

Documents to request

- hazard assessment;
- emergency-response plan;
- fire-safety plan;
- hazardous-material inventory;
- battery-system specifications;
- evacuation plan;
- mutual-aid agreements;
- emergency-services capacity study.

NOTES

10.2 Who pays for emergency capacity?

Question

Who will pay for additional firefighting equipment, specialized training, emergency staffing, water infrastructure and ongoing preparedness?

Common non-answer

The project will generate additional tax revenue for the municipality.

Required follow-up

Has the net cost of emergency readiness been calculated separately from projected tax revenue?

Will funding be guaranteed before operations begin?

Documents to request

- emergency-service cost study;
- capital-equipment estimate;
- staffing analysis;
- developer-contribution agreement;
- annual cost-recovery provisions;
- tax-revenue forecast;
- insurance requirements.

10.3 What firefighting substances and runoff controls are planned?

Question

What water, foam, suppression chemicals and runoff-containment systems may be used during a fire?

Common non-answer

Emergency response will follow accepted industry practice.

Required follow-up

Where will contaminated firefighting water or chemical runoff go, and who is responsible for containment, cleanup and long-term monitoring?

Documents to request

- suppression-system design;
- chemical safety data;
- runoff-containment plan;
- drainage maps;

- spill-response plan;
- remediation obligations;
- financial-security provisions.

NOTES

11. EMPLOYMENT AND ECONOMIC-BENEFIT CLAIMS

11.1 How many permanent jobs will exist?

Question

How many permanent, full-time-equivalent positions will be located at the facility after construction?

Common non-answer

The project will create thousands of direct, indirect and induced jobs.

Required follow-up

Separate:

- peak construction jobs;
- average construction jobs;
- construction duration;
- permanent full-time jobs;
- permanent part-time jobs;
- contract positions;
- remote positions;
- indirect jobs;
- induced economic estimates.

Documents to request

- employment model;
- job-category breakdown;
- staffing plan;
- construction schedule;
- consultant methodology;
- wage projections;
- local-hiring plan;
- automation assumptions.

11.2 Will employment commitments be enforceable?

NOTES

Question

What minimum employment, wage, training and local-hiring commitments will be conditions of approval or public support?

Common non-answer

The developer expects to hire locally wherever qualified workers are available.

Required follow-up

What happens if the promised positions are not created, are moved elsewhere, become automated or are filled through temporary contractors?

Documents to request

- employment agreement;
- reporting requirements;
- wage commitments;
- training commitments;
- clawback provisions;
- annual verification process;
- contractor reporting rules.

11.3 What is the public cost per permanent job?

Question

What is the total public cost per permanent full-time-equivalent position?

Include:

- tax concessions;
- grants;
- land discounts;
- utility upgrades;
- roads;
- water infrastructure;
- emergency-service costs;
- financing support;
- regulatory expenditures.

Common non-answer

The project's broader economic benefits cannot be reduced to a cost-per-job calculation.

Required follow-up

Broader benefits may be considered separately. What is the direct and indirect public expenditure divided by the verified number of permanent jobs?

Documents to request

- full incentive inventory;
- infrastructure-cost estimate;
- employment forecast;
- fiscal-impact study;
- tax-revenue forecast;
- public-service cost analysis.

NOTES

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12. TAXES, INCENTIVES AND PUBLIC INFRASTRUCTURE

12.1 What public support is being provided?

Question

List every tax concession, grant, rebate, discounted utility rate, infrastructure contribution, land arrangement, financing benefit and regulatory accommodation connected to the project.

Common non-answer

No final incentive package has been approved.

Required follow-up

What incentives have been requested, discussed, modelled, recommended or conditionally offered?

Documents to request

- incentive applications;
- term sheets;
- meeting records;
- tax agreements;
- grant applications;
- utility-rate agreements;
- land-transfer documents;
- infrastructure commitments;
- economic-development correspondence.

12.2 What is the net fiscal benefit?

Question

What is the projected net public benefit after deducting all public costs?

Common non-answer

The project will generate substantial new assessment and tax revenue.

Required follow-up

Provide the calculation after accounting for:

- abatements;
- exemptions;
- depreciation;
- infrastructure costs;
- emergency services;
- administrative costs;
- utility subsidies;
- financing costs;
- remediation liabilities.

Documents to request

- fiscal-impact analysis;
- assessment forecast;
- tax-abatement schedule;
- operating-cost forecast;
- public-infrastructure budget;
- sensitivity analysis;
- independent review.

12.3 Are there clawbacks?

Question

What public benefits must be repaid if the project is delayed, downsized, sold, automated, closed early or fails to meet employment and investment commitments?

Common non-answer

The agreement will contain customary performance provisions.

Required follow-up

Publish the specific milestones, reporting rules, repayment formulas, enforcement authority and security supporting those obligations.

Documents to request

- incentive agreement;
- performance schedule;
- clawback provisions;
- security instruments;
- audit rights;
- change-of-control provisions;
- default remedies.

NOTES

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13. DATA RESIDENCY, SOVEREIGNTY AND LEGAL JURISDICTION

13.1 What does the developer mean by data sovereignty?

Question

When the project is described as supporting Canadian data sovereignty, what specific form of sovereignty is being claimed?

Common non-answer

The data will be stored securely in Canada.

Required follow-up

Who owns and operates the infrastructure? Who has administrative access? Who controls the encryption keys? Which foreign parent companies, affiliates, subcontractors or governments may have legal access?

Documents to request

- ownership chart;
- operating agreements;
- access-control policy;
- encryption-key policy;
- subcontractor list;
- legal-jurisdiction analysis;
- government-access policy;
- data-processing agreements.

NOTES

13.2 Is Canadian data protected from foreign legal demands?

Question

Can a foreign government compel the owner, operator, parent company, affiliate or service provider to preserve, disclose or provide access to data stored in Canada?

Common non-answer

The company complies with Canadian privacy law and challenges inappropriate requests.

Required follow-up

Does foreign law apply to any entity with control or access? Who decides whether a demand is challenged, and must the affected Canadian customer or government be notified?

Documents to request

- legal opinion on jurisdiction;
- transparency reports;
- law-enforcement request policy;
- customer-notification rules;
- contractual disclosure provisions;
- corporate-control records.

13.3 Who controls encryption keys and administrative access?

Question

Who holds the encryption keys and privileged administrative credentials for the systems?

Common non-answer

The platform uses industry-leading encryption and security.

Required follow-up

Encryption does not establish sovereignty when the provider or foreign affiliate controls the keys, software or administrator accounts.

Identify who can decrypt, access, copy, transfer or suspend the data.

Documents to request

- key-management architecture;
- administrator-access policy;
- identity-management plan;

- subcontractor-access rules;
- audit logs;
- customer-control options;
- incident-response policy.

NOTES

14. SECURITY, SURVEILLANCE AND CRITICAL INFRASTRUCTURE

14.1 What information will the facility collect about the surrounding community?

Question

What surveillance, security and access-control systems will operate on or around the site?

Common non-answer

Security measures are confidential for safety reasons.

Required follow-up

Security details may require protection, but the public should know what categories of information are collected, how far surveillance extends beyond the property, how long records are retained and who can access them.

Documents to request

- privacy-impact assessment;
- surveillance-policy summary;
- data-retention schedule;
- camera and sensor boundary map;
- third-party access rules;
- law-enforcement disclosure policy.

14.2 Has national or public-security risk been assessed?

Question

Has the project's ownership, customer base, network role, energy dependence and foreign-jurisdiction exposure been reviewed as a critical-infrastructure matter?

Common non-answer

The facility will comply with all applicable cybersecurity requirements.

Required follow-up

Which authority conducted the review, what risks were included, and which enforceable conditions resulted?

Documents to request

- security-review confirmation;
- critical-infrastructure assessment;
- foreign-investment review records;
- cybersecurity certification;
- incident-reporting obligations;
- supply-chain risk assessment.

NOTES

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15. COMMUNITY INFRASTRUCTURE AND QUALITY OF LIFE

15.1 What public infrastructure will be affected?

Question

What roads, bridges, water systems, sewers, emergency services, housing and public facilities will need to expand or change because of construction and operation?

Common non-answer

The project site is located in an established industrial area.

Required follow-up

An industrial designation does not establish capacity. What construction traffic, oversized loads, workforce demand, utility expansion and maintenance costs will occur?

Documents to request

- traffic-impact assessment;
- road-condition survey;
- infrastructure-capacity study;
- construction-logistics plan;
- worker-accommodation forecast;
- public-service impact assessment;
- maintenance-cost agreement.

NOTES

15.2 What disruption will construction create?

Question

What are the expected construction hours, duration, truck movements, road closures, blasting, dust, lighting and noise impacts?

Common non-answer

Construction impacts will be temporary and managed through standard conditions.

Required follow-up

Temporary impacts lasting several years are still material. What enforceable limits, monitoring, complaint procedures and repair obligations will apply?

Documents to request

- construction-management plan;
- haul-route plan;
- schedule;
- noise and dust controls;
- road-repair agreement;
- lighting plan;
- complaint-response protocol.

---

16. CUMULATIVE AND REGIONAL EFFECTS

16.1 What other developments are being considered?

Question

What other data centres, generation projects, transmission lines, pipelines, industrial developments and water demands are proposed or anticipated in the region?

Common non-answer

This application must be considered on its own merits.

Required follow-up

How can the public interest be assessed without considering cumulative electricity, water, land, emissions, sound, infrastructure and emergency-service demands?

Documents to request

- regional development inventory;
- utility connection queue;
- cumulative-effects study;
- water-allocation map;

- transmission-expansion plan;
- industrial land-conversion map;
- regional emergency-capacity study.

NOTES

16.2 What growth is the project designed to attract?

Question

Is this proposal intended to anchor a larger industrial, computing, energy or logistics cluster?

Common non-answer

Any future proposals would be subject to their own approval processes.

Required follow-up

Has infrastructure been sized, land assembled or policy changed to accommodate additional developments?

What cumulative build-out is being planned even if individual applications have not yet been submitted?

Documents to request

- economic-development strategy;
- infrastructure master plan;
- regional servicing plan;
- marketing materials;
- land-assembly map;
- utility expansion forecast;
- correspondence with prospective developers.

---

17. MONITORING, REPORTING AND ENFORCEMENT

17.1 What information will be reported publicly?

Question

What operating information must the developer disclose after approval?

At minimum, reporting should address:

- electricity consumption;
- generation;

- water use;
- wastewater;
- emissions;
- sound;
- complaints;
- employment;
- tax benefits;
- outages;
- emergency incidents;
- regulatory breaches.

Common non-answer

The company will comply with all statutory reporting requirements.

Required follow-up

Which of those reports will be publicly accessible, how often will they be published, and will they cover the full project rather than separate entities?

Documents to request

- reporting schedule;
- proposed public dashboard;
- monitoring protocols;
- data-retention requirements;
- regulator-reporting obligations;
- audit provisions.

17.2 Who verifies developer-reported information?

Question

Who independently verifies the project's operating, environmental, employment and financial claims?

Common non-answer

The information will be prepared by qualified professionals.

Required follow-up

Who selects and pays those professionals? What audit rights do governments have? Can raw monitoring data be inspected independently?

Documents to request

- audit plan;
- consultant-retention terms;

- data-access provisions;
- inspection rights;
- regulator protocols;
- third-party verification requirements.

NOTES

17.3 What happens when requirements are breached?

Question

What enforcement actions apply when the developer exceeds limits, misses commitments or fails to report?

Common non-answer

The project will be subject to all available enforcement mechanisms.

Required follow-up

Identify the specific penalties, suspension powers, corrective-action deadlines, security forfeitures and permit-revocation provisions.

Documents to request

- draft permit conditions;
- penalty schedule;
- enforcement protocol;
- corrective-action requirements;
- suspension and revocation provisions;
- financial-security agreement.

---

18. FINANCIAL SECURITY, CLOSURE AND DECOMMISSIONING

18.1 Who pays if the project closes?

Question

Who is financially responsible if the facility closes, becomes obsolete, is abandoned, enters insolvency or leaves unfinished infrastructure?

Common non-answer

The site and equipment will retain substantial commercial value.

Required follow-up

Commercial value is not financial security. What protected funds, bonds, guarantees or letters of credit will be available to government regardless of the owner's solvency?

NOTES

Documents to request

- decommissioning-cost estimate;
- security agreement;
- parent guarantee;
- bond;
- letter of credit;
- insolvency analysis;
- closure plan;
- asset-removal plan.

18.2 What must be removed or remediated?

Question

What equipment and infrastructure must be removed, restored, recycled or remediated at closure?

Include:

- computing equipment;
- batteries;
- cooling systems;
- fuel systems;
- generators;
- substations;
- transmission infrastructure;
- pipelines;
- foundations;
- contaminated soil;
- water infrastructure;
- roads.

Common non-answer

Decommissioning will comply with applicable laws at the time of closure.

Required follow-up

Current approval should define the closure standard now and secure the funds required to meet it.

NOTES

Documents to request

- decommissioning plan;
- site-restoration standard;
- waste-management plan;
- hazardous-material inventory;
- equipment-recycling plan;
- cost estimate;
- review schedule.

18.3 Will financial security remain adequate?

Question

How often will the decommissioning estimate and financial security be reviewed?

Common non-answer

The amount will be established before operations begin.

Required follow-up

Will the security be adjusted for inflation, expansion, new equipment, contamination risk and changing disposal costs?

Documents to request

- security-adjustment formula;
- reassessment schedule;
- inflation provision;
- expansion-trigger requirements;
- independent cost-review process;
- enforcement rights.

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19. PRIVATE ACCESS, DRAFT POLICIES AND CONFIDENTIALITY

19.1 What private access has occurred?

Question

What meetings, presentations, calls, site visits and communications have occurred between the developer and elected representatives, administrators, utilities, economic-development bodies or government agencies?

Common non-answer

Officials routinely meet with potential investors as part of economic development.

Required follow-up

Routine practice does not remove the need for disclosure. Publish the dates, participants, topics discussed and materials supplied.

Documents to request

- calendars;
- meeting logs;
- correspondence;
- presentation decks;
- briefing notes;
- visitor records;
- expense records;
- consultant communications.

NOTES

19.2 Did the developer supply policy language?

Question

Did the developer, its lawyers, consultants or industry associations provide draft bylaws, policies, resolutions, agreements, permit conditions or legislative language?

Common non-answer

The developer provided technical information to assist officials in understanding the project.

Required follow-up

Did any supplied material contain proposed wording for public policy or agreements? If so, publish the original language and identify all changes adopted from it.

Documents to request

- draft policies;
- tracked-change documents;
- email attachments;
- consultant memoranda;
- template agreements;
- legal comments;
- revision histories.

NOTES

19.3 Were incentives discussed privately?

Question

What tax treatment, infrastructure support, grants, regulatory accommodations or other incentives were discussed before the proposal became public?

Common non-answer

No binding commitments were made.

Required follow-up

The question concerns discussions and expectations, not only signed agreements. What was requested, considered, modelled or represented as possible?

Documents to request

- meeting notes;
- term sheets;
- incentive models;
- internal recommendations;
- correspondence;
- preliminary agreements;
- economic-development files.

19.4 Were confidentiality agreements requested or signed?

Question

Did the developer request or obtain any NDA, confidentiality agreement or restricted-disclosure arrangement from a representative, employee, consultant, utility or public agency?

Common non-answer

Commercial confidentiality is necessary to protect proprietary information.

Required follow-up

Which information is covered, who agreed to secrecy, how long does it apply, and does it restrict disclosure of public policy, incentives, infrastructure commitments, environmental information or government negotiations?

Documents to request

- confidentiality agreements;
- NDA requests;
- legal opinions;
- confidentiality schedules;
- records withheld under claimed commercial sensitivity;

- expiry and termination provisions.

NOTES

20. THE FINAL DECISION

20.1 What remains unknown?

Before any approval, representatives should require a public list of:

- unanswered questions;
- documents not provided;
- studies not completed;
- permits not obtained;
- agreements not finalized;
- infrastructure not funded;
- legislation not enacted;
- monitoring not established;
- financial security not posted.

A missing answer should not quietly disappear from the decision record.

20.2 Which commitments are enforceable?

Question

Which statements made by the developer will become binding conditions of approval?

Common non-answer

The company intends to operate as a responsible long-term community partner.

Required follow-up

Which commitments are written into permits, agreements or legislation? Who monitors them, and what happens if they are not fulfilled?

Documents to request

- complete draft approval;
- development agreement;
- permit conditions;
- monitoring schedule;
- enforcement provisions;
- financial-security documents;

- public commitments register.

NOTES

20.3 What decision is actually being made?

Representatives should state clearly:

- what is being approved;
- what remains subject to later approval;
- which future phases could proceed without another hearing;
- which public funds or services are being committed;
- which rights are being granted;
- whether approvals can be transferred;
- what conditions must be satisfied first;
- what authority remains to pause, amend or revoke the approval.

No representative should be asked to vote on a project whose practical limits, public costs or future expansion rights remain undefined.

CLOSING STANDARD

The burden should not rest on the public to prove that a development might cause harm after the government has already granted the rights needed to build it.

The developer is asking for access to land, power, water, infrastructure, legal approvals and, in many cases, public financial support.

It should therefore carry the burden of providing complete, verifiable and publicly accessible information before irreversible decisions are made.

A polished presentation is not evidence.

A projected benefit is not a guarantee.

A promise is not an enforceable condition.

And a partial answer to a narrower question is not an answer to the question that was asked.

PART FOUR - IS THE PROJECT READY FOR A DECISION?

A PUBLIC-INTEREST DECISION CHECKLIST

A project should not advance merely because an application has been filed, a presentation has been delivered or a developer has supplied answers to some of the questions raised.

Before making an approval, rezoning, servicing, incentive, infrastructure or legislative decision, officials should determine whether the complete project has been disclosed, independently assessed and made subject to enforceable public-interest protections.

Use this checklist after reviewing the proposal and the questions in Part Three.

Mark each item:

YES — adequately demonstrated and documented
PARTIAL — some information provided, but material gaps remain
NO — requirement has not been met
UNKNOWN — the information has not been provided or verified

A project with material items marked **Partial, No or Unknown** is not ready for an irreversible decision.

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1. THE COMPLETE PROJECT HAS BEEN DEFINED

☐ Yes ☐ Partial ☐ No ☐ Unknown

Has the applicant disclosed the complete development at maximum reasonably foreseeable build-out, including:

- all planned phases;
- affiliated or commonly controlled facilities;
- power generation and fuel supply;
- substations and transmission;
- water withdrawal, treatment and disposal systems;
- roads and transportation infrastructure;
- emergency and fire-response requirements;
- associated land interests;

- supporting agreements and public commitments?

Has the project been assessed as one whole project rather than divided among separate applications, companies, sites or approval processes?

Notes

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2. OWNERSHIP AND CONTROL ARE TRANSPARENT

☐ Yes ☐ Partial ☐ No ☐ Unknown

Have officials verified:

- the applicant's legal identity;
- the ultimate beneficial owners;
- parent companies and affiliates;
- effective foreign ownership or control;
- the entities that will own and operate supporting infrastructure;
- the parties responsible for construction, operation and closure;
- what happens if the project or its assets are sold?

Notes

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3. THE EVIDENCE IS COMPLETE AND INDEPENDENTLY TESTED

☐ Yes ☐ Partial ☐ No ☐ Unknown

Have the project's material claims been supported by written evidence rather than presentations, forecasts or verbal assurances?

Have independent or public bodies reviewed the claims concerning:

- electricity demand and system capacity;
- water withdrawal, use, treatment and disposal;
- sound and vibration;
- air emissions;
- traffic and infrastructure;
- emergency response;

- environmental and cumulative effects;
- employment and economic benefits;
- public costs and liabilities?

Were the studies based on full build-out and credible worst-case operating conditions?

Notes

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4. PUBLIC COSTS HAVE BEEN IDENTIFIED AND ASSIGNED

☐ Yes ☐ Partial ☐ No ☐ Unknown

Has the complete public cost of the project been calculated and disclosed, including:

- grid connection and reinforcement;
- transmission and substations;
- roads and transportation;
- water and wastewater infrastructure;
- emergency and fire services;
- administrative and regulatory costs;
- tax concessions and incentives;
- land or infrastructure supplied below market value;
- long-term monitoring;
- closure, remediation and abandoned infrastructure?

Is it clear which costs will be paid by the developer and which may be transferred to municipalities, ratepayers, taxpayers or future governments?

Notes

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5. BENEFIT CLAIMS USE CLEAR DEFINITIONS

☐ Yes ☐ Partial ☐ No ☐ Unknown

Are employment, investment, tax-revenue and community-benefit claims supported by written definitions and methodologies?

Do employment figures distinguish:

- temporary construction work;
- long-term direct positions;
- full-time-equivalent employment;
- part-time and contract work;
- indirect and induced estimates;
- local, regional and non-local employment;
- projected positions from positions contractually guaranteed?

Are the claimed benefits enforceable, measurable and subject to public reporting?

Notes

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6. WATER HAS BEEN ASSESSED FROM WITHDRAWAL TO DISPOSAL

☐ Yes ☐ Partial ☐ No ☐ Unknown

Has the applicant disclosed the complete water system, including:

- maximum daily and annual withdrawals;
- peak seasonal demand;
- source water;
- evaporative losses;
- closed-loop replacement and flushing;
- blowdown and wastewater volumes;
- chemicals and treatment products;
- municipal wastewater connections;
- on-site treatment;
- discharge locations and standards;
- untreated or emergency releases;
- sludge and contaminated-residue disposal;
- drought restrictions;
- cumulative regional demand?

Notes

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7. ENERGY SUPPLY AND GRID EFFECTS ARE RESOLVED

☐ Yes ☐ Partial ☐ No ☐ Unknown

Has the complete maximum electrical demand been disclosed?

Has an independent assessment determined:

- whether sufficient supply exists;
- what new generation, storage or transmission is required;
- when that infrastructure will be operational;
- whether existing users may face higher costs or reduced reliability;
- whether interim grid dependence is proposed;
- who pays system-wide costs;
- what happens if promised generation is delayed?

Notes

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8. ENVIRONMENTAL AND COMMUNITY EFFECTS HAVE BEEN ASSESSED CUMULATIVELY

☐ Yes ☐ Partial ☐ No ☐ Unknown

Does the review consider the combined effects of:

- the data-centre buildings;
- associated generation;
- fuel infrastructure;
- transmission;
- water systems;
- roads;
- construction;
- future phases;
- other existing and proposed facilities in the region?

Have impacts on nearby residents, agriculture, Indigenous rights and interests, wildlife, waterways, future land uses and emergency services been considered?

Notes

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9. REQUIRED PROTECTIONS ARE ENFORCEABLE

☐ Yes ☐ Partial ☐ No ☐ Unknown

Are important commitments contained in:

- legislation;
- bylaws;
- permits;
- binding agreements;
- approval conditions;
- financial-security instruments?
- Or do they remain voluntary promises, sustainability goals, presentation statements or future intentions?

Do the protections include:

- measurable limits;
- public reporting;
- independent monitoring;
- inspection authority;
- consequences for non-compliance;
- corrective-action requirements;
- suspension or operating restrictions where necessary?

Notes

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10. CLOSURE AND OWNERSHIP CHANGE ARE PROVIDED FOR

☐ Yes ☐ Partial ☐ No ☐ Unknown

Before construction begins, are there enforceable provisions for:

- decommissioning;

- electronic waste;
- batteries and hazardous materials;
- infrastructure removal;
- land restoration;
- contamination;
- abandoned or obsolete facilities;
- ownership transfer;
- insolvency or bankruptcy?

Is sufficient protected financial security already in place, and will it be reviewed as the facility expands or costs change?

Notes

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11. THE PUBLIC RECORD IS COMPLETE

☐ Yes ☐ Partial ☐ No ☐ Unknown

Are the following publicly accessible:

- the full application;
- supporting studies;
- ownership disclosures;
- public-cost estimates;
- incentive agreements;
- infrastructure commitments;
- written questions and responses;
- material revisions;
- draft approval conditions;
- monitoring and reporting requirements?

Have unanswered questions, deferred responses and missing documents been clearly recorded?

Notes

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12. THE DECISION-MAKING PROCESS IS INDEPENDENT AND TRANSPARENT

☐ Yes ☐ Partial ☐ No ☐ Unknown

Have officials disclosed:

- private meetings with proponents;
- developer-supplied policy or bylaw language;
- confidentiality or non-disclosure agreements;
- lobbying and third-party representation;
- financial or institutional conflicts;
- commitments made before the public process?

Has the public had a meaningful opportunity to review the complete project and evidence before an irreversible decision is made?

Notes

DECISION READINESS

Material gaps remaining

List the most important items marked **Partial, No or Unknown**:

1. ---
2. ---
3. ---
4. ---
5. ---

Documents still required

Responsibility for follow-up

Recommended next step

☐ Proceed to the next review stage

☐ Proceed only after specified information is received

☐ Defer the decision

☐ Require an independent assessment

☐ Refer part of the project to another authority

☐ Require legislative or regulatory protections first

☐ Decline the current application

Reasons

THE DECISION STANDARD

An investment announcement is not a completed assessment.

A developer's answer is not independent verification.

A voluntary promise is not an enforceable condition.

A project is ready for approval only when its full scope, effects, costs, responsibilities and long-term protections are known and secured.

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PART FIVE - POLICY, EVIDENCE AND QUESTION RESOURCES

WHERE TO GO WHEN MORE DETAIL IS NEEDED

This briefing package provides a practical starting point. The resources below offer deeper questions, evidence, model policies and legislative options.

They are not required reading from beginning to end. Use the resource that matches the issue or decision before you.

Find the right resource

To investigate a proposal or prepare questions: Start with *The Data Center Anarchists' Handbook*.

To prevent a development from being divided among separate applications or approvals: Use the *Whole Project Assessment and Anti-Fragmentation Policy*.

To examine whether provincial or territorial protections are adequate: Use *10 Laws Provinces Should Have in Place Before Approving Data Centres*.

To establish consistent employment-reporting standards: Use *The Jobs Reporting Act*.

To develop modern industrial-sound requirements: Use *On Data Centres & Sound Levels*.

To evaluate claims about Canadian data sovereignty: Use the Government of Canada white paper and Digital Sovereignty Framework.

To compare developer claims with government and independent evidence: Use the selected external reports listed later in this section.

PUBLIC-INTEREST TOOLS AND MODEL POLICIES

The Data Center Anarchists' Handbook

Best used for

- preparing for developer meetings or public hearings;
- identifying questions that have not been answered;
- recognizing incomplete or misleading responses;
- determining which documents should be requested;
- turning general concerns into precise public-record questions.

Despite its deliberately disruptive title, the Handbook is not an argument against every data centre or against regulation.

The name reflects a refusal to leave developers, consultants and approving bodies as the only parties permitted to define the project, its impacts and the information the public is allowed to see.

Each chapter is organized around practical use:

- the issue;
- why it matters;
- questions to ask;
- common red flags;
- documents to request;
- a public-interest test.

Readers can move directly to the chapter relevant to electricity, water, sound, land, employment, subsidies, ownership, environmental assessment, emergency planning, data sovereignty or another part of a proposal.

Read or download:
The Data Center Anarchists' Handbook
https://archive.org/details/the-data-center-anarchists-handbook

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Whole Project Assessment and Anti-Fragmentation Policy

Best used for

- defining the complete development;
- identifying connected facilities and infrastructure;
- preventing separate companies, parcels, phases or permits from concealing the project's full scale;
- aggregating project components for environmental and ownership review;
- developing coordinated municipal and senior-government approval processes.

The policy starts from one governing principle:

A project should be defined by what is functionally and commercially required to build, operate, expand and close it—not by how the proponent divides, names, owns, finances or submits its components.

The complete resource includes integration tests, ownership and land-disclosure provisions, environmental-threshold aggregation, coordinated review mechanisms, a public registry and an Alberta implementation addendum.

Read and adapt:
Whole Project Assessment and Anti-Fragmentation Policy
https://lawrencenault.me/policy/whole-project-assessment-and-anti-fragmentation-policy/

TEN LAWS BEFORE DEVELOPMENT

Best used for

reviewing provincial or territorial readiness;

identifying missing statutory protections;

preparing recommendations for legislators;

establishing public-interest conditions before projects become difficult to refuse.

10 Laws Provinces Should Have in Place Before Approving Data Centres proposes protections addressing:

- grid and infrastructure costs;
- independent electricity-adequacy testing;
- new power and storage;
- water use and drought priority;
- cumulative watershed effects;
- waste-heat recovery;
- generator emissions;
- facility-level public reporting;
- community burdens and benefits;
- decommissioning and financial security.

The proposals are a starting framework, not a complete substitute for municipal bylaws, environmental review, ownership disclosure or federal oversight.

Read the complete proposals:
10 Laws Provinces Should Have in Place Before Approving Data Centres
https://lawrencenault.substack.com/p/10-laws-provinces-should-have-in

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The Jobs Reporting Act

Best used for

- evaluating employment claims;
- separating construction work from permanent employment;
- distinguishing direct jobs from indirect or induced estimates;

- establishing standardized public reporting;
- comparing projected jobs with jobs actually created and retained.

No employment figure should be accepted without a written definition and methodology.

Where a government or approving body has no standard for reporting employment claims, *The Jobs Reporting Act* provides an adaptable framework for defining and reporting:

- short-term and long-term work;
- direct employment;
- full-time-equivalent positions;
- part-time and contract work;
- local and non-local employment;
- living-wage positions;
- estimated indirect and induced employment;
- job retention and project performance.

Read and adapt:
The Jobs Reporting Act
https://lawrencenault.me/policy/the-jobs-reporting-act/

On Data Centres & Sound Levels

Best used for

- reviewing proposed sound studies;
- developing permit or bylaw requirements;
- examining low-frequency, tonal and nighttime sound;
- addressing effects beyond the nearest occupied residence;
- establishing public monitoring and post-construction enforcement.

The policy proposal explains why a single averaged, A-weighted decibel figure may not adequately describe the sound environment created by a large data-centre complex.

It proposes assessment of:

- average and maximum levels;
- low-frequency sound;
- tonal characteristics;
- vibration;
- nighttime and peak operation;
- generator testing;
- seasonal and atmospheric conditions;

- associated power infrastructure;
- livestock, wildlife, waterways and future land uses.

Read the policy proposal:
On Data Centres & Sound Levels: A Policy Proposal for Modernizing Industrial Noise Regulation
https://lawrencenault.substack.com/p/on-data-centres-and-sound-levels

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CANADIAN DATA SOVEREIGNTY

Government of Canada: Data Sovereignty and Public Cloud

Best used for

- distinguishing data residency from data sovereignty;
- examining foreign legal jurisdiction;
- questioning foreign corporate ownership and administrative access;
- evaluating public-sector cloud and hosting claims.

The federal white paper recognizes that storing data in Canada does not necessarily place it fully under Canadian control when the service provider remains subject to foreign law.

Read the white paper:
Government of Canada White Paper: Data Sovereignty and Public Cloud
https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/cloud-services/digital-sovereignty/gc-white-paper-data-sovereignty-public-cloud.html

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Government of Canada: Digital Sovereignty Framework

Best used for

- examining operational control;
- evaluating foreign supplier dependence;
- considering cybersecurity and supply-chain exposure;
- determining whether sovereignty survives a sale or change of control.

The framework considers sovereignty more broadly than physical storage location. It includes legal, operational, security, workforce, intellectual-property and supply-chain factors.

Read the framework:
Digital Sovereignty: A Framework to Improve Digital Readiness of the Government of Canada
https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/cloud-services/digital-sovereignty/digital-sovereignty-framework-improve-digital-readiness.html

GOVERNMENT AND INDEPENDENT EVIDENCE

Large-scale development experience

Data Centers in Virginia

Produced by: Virginia Joint Legislative Audit and Review Commission

A comprehensive government review of data-centre development at regional scale. It examines electricity demand, transmission, ratepayer effects, employment, tax revenue, incentives, land use, water, sound and community impacts.

Use it to: test employment and economic claims, examine cumulative growth and understand issues that may not become visible during the first project approval.

https://jlarc.virginia.gov/landing-2024-data-centers-in-virginia.asp

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Municipal planning and bylaws

Data Center Ordinance Guide

Produced by: Chester County and Montgomery County Planning Commissions

A municipal planning guide covering zoning, conditional uses, campus definitions, associated infrastructure, setbacks, buffers, energy systems, sound, water, emergency access, construction and decommissioning.

Use it to: review existing bylaws, prepare instructions for planning staff and identify development standards that may be missing.

https://www.chescoplanning.org/UandI/DataCenters/pdf/DataCenterOrdinanceGuide.pdf

Local Ordinances to Help Bring Data Centers into Alignment with Climate Goals

Produced by: Georgetown Climate Center

A policy paper examining how local governments can use zoning, permits, overlay districts and incentive conditions to address energy efficiency, emissions, storage and land-use impacts.

Use it to: explore municipal approval conditions and identify questions for legal counsel about local authority.

https://www.georgetownclimate.org/files/Local-Ordinances-Report/GCC_Local_Ordinances_Data_Centers_2025.pdf

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ELECTRICITY DEMAND

2024 United States Data Center Energy Usage Report

Produced by: Lawrence Berkeley National Laboratory for the United States Department of Energy

A technical assessment of historical and projected data-centre electricity consumption, cooling, equipment, water use, efficiency and AI-driven demand.

Use it to: compare developer forecasts with independent sector-wide analysis and support grid-planning or reporting requirements.

https://eta.lbl.gov/publications/2024-lbnl-data-center-energy-usage-report

Energy and AI

Produced by: International Energy Agency

A global analysis of AI, data-centre electricity demand, generation, regional concentration, grid constraints and uncertainty.

Use it to: place individual projects within broader energy-system growth and cumulative demand.

https://www.iea.org/reports/energy-and-ai

WATER USE

The Water Use of Data Center Workloads

Produced by: Lawrence Berkeley National Laboratory researchers

Research examining how cooling, climate, server efficiency, utilization, equipment, electricity generation and other factors affect water consumption.

Use it to: challenge generic claims such as “closed loop,” “air cooled” or “water efficient” and require complete, site-specific water calculations.

https://eta.lbl.gov/publications/water-use-data-center-workloads

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ENVIRONMENTAL SOUND AND HEALTH

World Health Organization Guidance on Environmental Noise

Public-health evidence concerning the effects of environmental noise on sleep, cardiovascular health, cognition, annoyance and quality of life.

Use it to: establish that sound is a health and environmental issue, not merely a question of compliance with one averaged decibel limit.

The guidance is not specific to data centres and should not be presented as a data-centre sound standard.

https://www.who.int/tools/compendium-on-health-and-environment/environmental-noise

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CANADIAN OPERATIONAL PRACTICE

Best Practice Guide for Canadian Data Centres

Produced by: Natural Resources Canada

Canadian guidance on energy monitoring, metering, benchmarking and operational efficiency.

Use it to: identify recognized operational practices and compare them with the commitments made by a proposed facility.

This is an operational guide, not an environmental-assessment or approval framework.

https://natural-resources.canada.ca/energy-efficiency/building-energy-efficiency/new-best-practice-guide-canadian-data-centres-now-available

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USING EXTERNAL EVIDENCE

A report from another jurisdiction does not prove that the same outcome will occur locally.

It does show that the issue is foreseeable and should be examined rather than dismissed.

When reviewing a developer or consultant report, ask:

- Who selected and paid the authors?
- What question were they asked to answer?
- What project components or future phases were excluded?
- Which assumptions came from the developer?
- Are the underlying data available?
- Were uncertainty and alternative scenarios considered?
- Was the work independently reviewed?
- Does it assess the complete project or only the first phase?

Developer and industry materials may contain useful information. They should be clearly identified and tested against independent evidence.

The purpose of this resource section is not to predetermine the decision.

It is to ensure that the developer's materials are not the only materials placed before decision-makers.

Appendix 1

DATA CENTRE REVIEW TRACKER

PRINTABLE DOCUMENT CHECKLIST

This checklist tracks the documents to request for each question in Part Three (Questions, Non-Answers and Required Follow-Ups). Mark each row as documents are requested and received, and record notes as materials come in or fail to arrive.

Project / proposal name: _____

Municipality or jurisdiction: _____

Developer / applicant of record: _____

Reviewer name and date: _____

Status legend: R = Received P = Partial N = Not Received — = Not Requested

1. COMPLETE PROJECT SCOPE

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
1.1	What is the complete project? — master development plan; phased site plans; investor or customer presentations; utility service requests; land-option agreements; internal build-out schedules; infrastructure concept plans; applications submitted to other regulators; maps showing all affiliated parcels		☐R ☐P ☐N ☐—	
1.2	Which components are being reviewed separately? — regulatory approvals matrix; list of required permits; names of all approving authorities; application schedules;		☐R ☐P ☐N ☐—	

	consultant responsibility charts; correspondence concerning project segmentation; legal opinions concerning jurisdiction			
1.3	What is the maximum authorized build-out? — requested zoning entitlements; development-envelope calculations; maximum floor-area projections; maximum electrical-service applications; water-reservation requests; expansion-right agreements; conceptual final-build plans		☐R ☐P ☐N ☐—	

2. OWNERSHIP, CONTROL AND AFFILIATED COMPANIES

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
2.1	Who ultimately owns and controls the project? — complete corporate-ownership chart; beneficial-ownership declaration; incorporation records; shareholder agreements; financing agreements; operating agreements; management contracts; parent-company guarantees; joint-venture agreements		☐R ☐P ☐N ☐—	
2.2	Which entities are involved? — list of related entities; land-title records; option agreements; assignment rights; contracts between affiliates; applications filed under related company names; shared directors and officers; registered lobbying disclosures		☐R ☐P ☐N ☐—	
2.3	Can the project or approvals be sold? — permit-transfer provisions; assignment clauses; change-of-control clauses; tax-agreement transfer rights; servicing-agreement transfer rights; regulator approval requirements; lender step-in rights; **\; **		☐R ☐P ☐N ☐—	

3. LAND ASSEMBLY AND LAND-USE IMPACTS

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
3.1	How much land is controlled? — land-title searches; lease agreements; purchase options; rights of first refusal; easements; pipeline and transmission corridors; maps of affiliated ownership; agreements with neighbouring landowners		☐R ☐P ☐N ☐—	
3.2	What land uses will be displaced or constrained? — agricultural-impact assessment; land-use compatibility study; ecological inventory; drainage study; traffic study; cultural and heritage assessment; neighbouring-land-use analysis; cumulative land-conversion maps		☐R ☐P ☐N ☐—	

4. ELECTRICITY DEMAND

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
4.1	What is the maximum electrical load? — utility interconnection applications; load forecasts; maximum-demand studies; electrical design specifications; phased energization plans; customer-capacity commitments; transmission studies		☐R ☐P ☐N ☐—	
4.2	What will annual electricity consumption be? — annual consumption models; utilization assumptions; power-usage-effectiveness projections; hourly and seasonal load profiles; customer-demand forecasts; sensitivity analyses		☐R ☐P ☐N ☐—	
4.3	When will the load connect to the grid? — energization schedule; construction sequencing; temporary-service agreements; grid-supply contracts; generation in-service dates; contingency plans for delayed generation; utility correspondence		☐R ☐P ☐N ☐—	

5. DEDICATED POWER GENERATION

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
5.1	What generation will serve the facility? — generation applications; equipment specifications; ownership agreements; fuel-supply contracts; generation forecasts; emissions modelling; construction schedules; interconnection studies		☐R ☐P ☐N ☐—	
5.2	Is the generation part of the project? — power-purchase agreements; common-ownership records; shared financing documents; fuel and transmission agreements; generation-customer contracts; shared construction plans; internal project descriptions		☐R ☐P ☐N ☐—	
5.3	What happens if dedicated generation is delayed? — fallback-energy plan; grid-service agreements; curtailment arrangements; contingency forecasts; milestone conditions; enforcement provisions; termination rights		☐R ☐P ☐N ☐—	

6. GRID, TRANSMISSION AND RATEPAYER IMPACTS

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
6.1	Who pays for grid expansion? — cost-allocation studies; interconnection agreements; transmission-upgrade estimates; utility rate applications; contribution agreements; public-infrastructure commitments; cost-recovery schedules		☐R ☐P ☐N ☐—	
6.2	Could existing customers face higher costs or reduced reliability? — reliability assessment; congestion study; reserve-margin analysis; rate-impact analysis; system-expansion plan; queue-position records; curtailment protocols		☐R ☐P ☐N ☐—	

6.3	Will the project be required to curtail? — demand-response agreements; operating protocols; emergency-curtailment terms; minimum-load requirements; backup-generation plans; enforcement provisions		☐R ☐P ☐N ☐—	

7. RENEWABLE-ENERGY AND EMISSIONS CLAIMS

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
7.1	What does "powered by renewable energy" mean? — power-purchase agreements; renewable-energy certificates; hourly matching methodology; emissions-accounting rules; generation-location data; additionality analysis; offset contracts		☐R ☐P ☐N ☐—	
7.2	What are the complete emissions? — emissions inventory; lifecycle assessment; air-dispersion modelling; fuel-consumption forecasts; refrigerant inventory; generator-testing schedule; purchased-electricity emissions factors		☐R ☐P ☐N ☐—	

8. WATER SUPPLY, COOLING AND WASTEWATER

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
8.1	How much water will the project use? — water-balance model; cooling-system design; maximum withdrawal calculations; seasonal demand forecast; water-usage-effectiveness projections; emergency-water plan; expansion assumptions		☐R ☐P ☐N ☐—	
8.2	Where will the water come from? — water-supply agreement; allocation licence; municipal capacity study; source-water assessment; drought plan; infrastructure-upgrade plan; cost-allocation agreement		☐R ☐P ☐N ☐—	

8.3	What happens during drought or extreme heat? — drought-response plan; priority-of-use rules; curtailment conditions; emergency operating plan; historical supply modelling; climate-stress testing		☐R ☐P ☐N ☐—	
8.4	What wastewater will be produced? — wastewater-characterization study; discharge application; treatment plan; chemical inventory; temperature modelling; sewer-capacity analysis; monitoring plan		☐R ☐P ☐N ☐—	

9. SOUND, LOW-FREQUENCY NOISE AND VIBRATION

Q #	Documents to request	Requested (date)	Status R / P / N / —	Notes
9.1	What will the complete project sound like? — full acoustic-impact assessment; frequency-band data; tonal analysis; low-frequency analysis; vibration study; equipment sound specifications; modelling files; nighttime scenarios; cumulative-noise model		☐R ☐P ☐N ☐—	
9.2	Who prepared the sound study? — consultant engagement letter; scope of work; modelling instructions; conflict-of-interest declaration; equipment assumptions; peer-review report; correspondence concerning revisions		☐R ☐P ☐N ☐—	
9.3	How will sound be monitored after construction? — monitoring plan; equipment specifications; public-data protocol; complaint procedure; investigation timelines; corrective-action requirements; penalty provisions; independent-audit schedule		☐R ☐P ☐N ☐—	

10. EMERGENCY RESPONSE, FIRE AND HAZARDOUS MATERIALS

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
10.1	What emergency risks exist? — hazard assessment; emergency-response plan; fire-safety plan; hazardous-material inventory; battery-system specifications; evacuation plan; mutual-aid agreements; emergency-services capacity study		☐R ☐P ☐N ☐—	
10.2	Who pays for emergency capacity? — emergency-service cost study; capital-equipment estimate; staffing analysis; developer-contribution agreement; annual cost-recovery provisions; tax-revenue forecast; insurance requirements		☐R ☐P ☐N ☐—	
10.3	What firefighting substances and runoff controls are planned? — suppression-system design; chemical safety data; runoff-containment plan; drainage maps; spill-response plan; remediation obligations; financial-security provisions		☐R ☐P ☐N ☐—	

11. EMPLOYMENT AND ECONOMIC-BENEFIT CLAIMS

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
11.1	How many permanent jobs will exist? — employment model; job-category breakdown; staffing plan; construction schedule; consultant methodology; wage projections; local-hiring plan; automation assumptions		☐R ☐P ☐N ☐—	
11.2	Will employment commitments be enforceable? — employment agreement; reporting requirements; wage commitments; training commitments; clawback provisions; annual verification process; contractor reporting rules		☐R ☐P ☐N ☐—	
11.3	What is the public cost per permanent job? — full incentive inventory; infrastructure-cost estimate; employment forecast; fiscal-impact study; tax-revenue forecast; public-service cost analysis		☐R ☐P ☐N ☐—	

12. TAXES, INCENTIVES AND PUBLIC INFRASTRUCTURE

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
12.1	What public support is being provided? — incentive applications; term sheets; meeting records; tax agreements; grant applications; utility-rate agreements; land-transfer documents; infrastructure commitments; economic-development correspondence		☐R ☐P ☐N ☐—	
12.2	What is the net fiscal benefit? — fiscal-impact analysis; assessment forecast; tax-abatement schedule; operating-cost forecast; public-infrastructure budget; sensitivity analysis; independent review		☐R ☐P ☐N ☐—	
12.3	Are there clawbacks? — incentive agreement; performance schedule; clawback provisions; security instruments; audit rights; change-of-control provisions; default remedies		☐R ☐P ☐N ☐—	

13. DATA RESIDENCY, SOVEREIGNTY AND LEGAL JURISDICTION

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
13.1	What does the developer mean by data sovereignty? — ownership chart; operating agreements; access-control policy; encryption-key policy; subcontractor list; legal-jurisdiction analysis; government-access policy; data-processing agreements		☐R ☐P ☐N ☐—	
13.2	Is Canadian data protected from foreign legal demands? — legal opinion on jurisdiction; transparency reports; law-enforcement request policy; customer-notification rules; contractual disclosure provisions; corporate-control records		☐R ☐P ☐N ☐—	
13.3	Who controls encryption keys and administrative access? — key-management architecture; administrator-access policy; identity-management plan; subcontractor-access rules; audit logs; customer-control options; incident-response policy		☐R ☐P ☐N ☐—	

14. SECURITY, SURVEILLANCE AND CRITICAL INFRASTRUCTURE

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
14.1	What information will the facility collect about the surrounding community? — privacy-impact assessment; surveillance-policy summary; data-retention schedule; camera and sensor boundary map; third-party access rules; law-enforcement disclosure policy		☐R ☐P ☐N ☐—	
14.2	Has national or public-security risk been assessed? — security-review confirmation; critical-infrastructure assessment; foreign-investment review records; cybersecurity certification; incident-reporting obligations; supply-chain risk assessment		☐R ☐P ☐N ☐—	

15. COMMUNITY INFRASTRUCTURE AND QUALITY OF LIFE

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
15.1	What public infrastructure will be affected? — traffic-impact assessment; road-condition survey; infrastructure-capacity study; construction-logistics plan; worker-accommodation forecast; public-service impact assessment; maintenance-cost agreement		☐R ☐P ☐N ☐—	
15.2	What disruption will construction create? — construction-management plan; haul-route plan; schedule; noise and dust controls; road-repair agreement; lighting plan; complaint-response protocol		☐R ☐P ☐N ☐—	

16. CUMULATIVE AND REGIONAL EFFECTS

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
16.1	What other developments are being considered? — regional development inventory; utility connection queue; cumulative-effects study; water-allocation map; transmission-expansion plan; industrial land-conversion map; regional emergency-capacity study		☐R ☐P ☐N ☐—	
16.2	What growth is the project designed to attract? — economic-development strategy; infrastructure master plan; regional servicing plan; marketing materials; land-assembly map; utility expansion forecast; correspondence with prospective developers		☐R ☐P ☐N ☐—	

17. MONITORING, REPORTING AND ENFORCEMENT

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
17.1	What information will be reported publicly? — reporting schedule; proposed public dashboard; monitoring protocols; data-retention requirements; regulator-reporting obligations; audit provisions		☐R ☐P ☐N ☐—	
17.2	Who verifies developer-reported information? — audit plan; consultant-retention terms; data-access provisions; inspection rights; regulator protocols; third-party verification requirements		☐R ☐P ☐N ☐—	
17.3	What happens when requirements are breached? — draft permit conditions; penalty schedule; enforcement protocol; corrective-action requirements; suspension and revocation provisions; financial-security agreement		☐R ☐P ☐N ☐—	

18. FINANCIAL SECURITY, CLOSURE AND DECOMMISSIONING

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
18.1	Who pays if the project closes? — decommissioning-cost estimate; security agreement; parent guarantee; bond; letter of credit; insolvency analysis; closure plan; asset-removal plan		☐R ☐P ☐N ☐—	
18.2	What must be removed or remediated? — decommissioning plan; site-restoration standard; waste-management plan; hazardous-material inventory; equipment-recycling plan; cost estimate; review schedule		☐R ☐P ☐N ☐—	
18.3	Will financial security remain adequate? — security-adjustment formula; reassessment schedule; inflation provision; expansion-trigger requirements; independent cost-review process; enforcement rights		☐R ☐P ☐N ☐—	

19. PRIVATE ACCESS, DRAFT POLICIES AND CONFIDENTIALITY

Q#	Documents to request	Requested (date)	Status R / P / N / —	Notes
19.1	What private access has occurred? — calendars; meeting logs; correspondence; presentation decks; briefing notes; visitor records; expense records; consultant communications		☐R ☐P ☐N ☐—	
19.2	Did the developer supply policy language? — draft policies; tracked-change documents; email attachments; consultant memoranda; template agreements; legal comments; revision histories		☐R ☐P ☐N ☐—	
19.3	Were incentives discussed privately? — meeting notes; term sheets; incentive models; internal recommendations; correspondence; preliminary agreements; economic-development files		☐R ☐P ☐N ☐—	
19.4	Were confidentiality agreements requested or signed? — confidentiality agreements; NDA requests; legal opinions; confidentiality schedules; records withheld under claimed commercial sensitivity; expiry and termination provisions		☐R ☐P ☐N ☐—	